

PBT Proposed Rule Comments:

1. It should be “toxics”, not toxins.
2. Why are registered pesticides exempt? If they are known to bioaccumulate, they should be included whether they are legal or not.
3. How will ecology coordinate with Tribes? I want more specifics here that include government-to-government consultation if necessary. Does Ecology already have an established method/ avenue to coordinate with Tribes? (p.4).
4. The PBT chemical list is too short—where is arsenic? Organotins such as TBT? Others?
5. For rule revisions, it says “periodically,” I want a specific time schedule, such as every two or three years...(p.9/10/11)
6. (p.12) Why in the previous section does it define persistent as 60days for all media but in this section it gives 180 days for soil/ sediment? Keep all at 60days.
7. (p14 section c), They need to think outside the established numbers box here—impacts to human health should be defined much broader as employing the WHO definition of health in the beginning definition section (i.e., the World Health Organization’s constitutional definition of health—“a state of complete physical, mental and social well-being and not merely the absence of disease or infirmity” (WHO 1946))